

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	
	:	
v.	:	CIVIL NO. 14-570-MJR-PMF
	:	
ONE BERSA 9mm THUNDER SEMI-	:	
AUTOMATIC PISTOL, BEARING	:	
SERIAL NUMBER D35435 AND ANY	:	
AND ALL AMMUNITION CONTAINED	:	
THEREIN OR SEIZED THEREWITH,	:	
	:	
DEFENDANT.	:	

**VERIFIED COMPLAINT FOR FORFEITURE**

Now comes plaintiff, the United States of America, by and through its attorneys, Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Jennifer Hudson, Assistant United States Attorney, and respectfully states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C. § 924(d)(1) for the forfeiture of property which constitutes a firearm involved in or used in a knowing violation of 18 U.S.C. § 922(g)(1).
2. This Court has subject-matter jurisdiction over this matter by virtue of 28 U.S.C. § 1345, *in rem* jurisdiction by virtue of 28 U.S.C. § 1355, and venue by virtue of 28 U.S.C. § 1395(b).
3. The defendant property was seized on or about October 23, 2013, while located within the jurisdiction of this Court and more specifically, at the Monroe County, Illinois Sheriff's Department.

4. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in Exhibit A, which is attached hereto and fully incorporated herein by reference.

5. The defendant property constitutes firearms and ammunition involved in or used in a knowing violation of 18 U.S.C. § 922(g)(1).

6. The specific firearm that is the subject-matter of this complaint is one Bersa 9mm Thunder semiautomatic pistol, bearing serial number D35435, and any and all ammunition contained therein or seized therewith.

7. The property is already in the possession, custody, and control of the United States.

WHEREFORE, the United States of America prays that a Warrant and Summons for Arrest of Articles *In Rem* be issued for the defendant property; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property to be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

STEPHEN R. WIGGINTON  
United States Attorney

*/s/ Jennifer Hudson*  
JENNIFER HUDSON  
Assistant United States Attorney  
Nine Executive Drive  
Fairview Heights, Illinois 62208  
(618) 628-3700

**DECLARATION**

I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the agent assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the exhibits thereto, and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 19th day of May, 2014.

*/s/ Adam Ulery w/consent*

ADAM ULERY

Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives